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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

LORI JEAN YAHN, individually and as co-Special Administrator of the Estate of TIMOTHY J. YAHN, deceased; KYLE JAMES YAHN, individually; ZACHARY LEE YAHN, individually; ALEXANDER SCOTT YAHN, individually; JANICE GONALEZ, as Co-Special Administrator of the Estate of TIMOTHY J. YAHN, deceased,

Plaintiff,

vs.

KENTUCKY WESTERN CO., a foreign corporation; MARTIN DOUGLAS WILSON, an individual; DOES 1 through 10; ROE ENTITIES 11 through 20; and ABC LIMITED LIABILITY COMPANIES 21 through 30,

Defendants.

CASE NO: 3:21-cv-00227-MMD-WGC

Formerly Case No. 2:21-cv-00890

**PROPOSED STIPULATION AND  
ORDER TO EXTEND THE TIME TO  
FILE PLAINTIFF'S REPLY TO  
DEFENDANT'S OPPOSITION TO  
PLAINTIFF'S MOTION TO REMAND**

IT IS HEREBY STIPULATED AND AGREED by and between Plaintiffs, LORI JEAN YAHN, individually and as co-Special Administrator of the Estate of TIMOTHY J. YAHN,

deceased (“Plaintiff Lori”); KYLE JAMES YAHN, individually (“Plaintiff Kyle”); ZACHARY LEE YAHN, individually (“Plaintiff Zachary”); ALEXANDER SCOTT YAHN, individually (“Plaintiff Alexander”); JANICE GONALEZ, as Co-Special Administrator of the Estate of TIMOTHY J. YAHN, deceased (hereinafter collectively “Plaintiffs”), by and through their counsels of record, Brian D. Nettles, Esq., Christian M. Morris, Esq. and Victoria R. Allen, Esq., of the law firm Nettles | Morris, and Defendants KENTUCKY WESTERN CO., and MARTIN DOUGLAS WILSON, by and through their attorneys, STEVEN T. JAFFE, ESQ. and DANIEL C. TETREAULT, ESQ. of the law firm HALL JAFFE & CLAYTON, LLP, that the time to reply to Defendant’s Opposition to Plaintiff’s Motion to Remand be extended from June 22, 2021 to June 24, 2021.

Dated this 23<sup>rd</sup> day of June, 2021.

NETTLES | MORRIS

/s/ Victoria R. Allen  
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Dated this 23<sup>rd</sup> day of June, 2021.

HALL JAFFE & CLAYTON, LLP

/s/ Daniel C. Tetreault  
DANIEL C. TETREAULT, ESQ.  
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*Attorneys for Defendants*

**ORDER**

IT IS FURTHER ORDERED that Plaintiff’s Reply to Defendant’s Opposition to Plaintiff’s Motion to Remand shall be due June 24, 2021.

DATED this 24<sup>th</sup> day of June, 2021.



FEDERAL COURT JUDGE